

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE LESLEY WELLS
)	
v.)	
)	
SAP AMERICA, INC., et al.)	
)	
Defendants.)	
)	

Plaintiff Hodell-Natco Industries, Inc., in accordance with the parties' agreement to renumber exhibits in a manner consistent with the number assigned them at deposition, and in response to the Court's Order of February 11, 2015 [ECF #279] relating to the admissibility of exhibits, submits the following revised Exhibit List identifying exhibits Hodell intends to introduce at the trial of this matter.

PLAINTIFF HODELL-NATCO'S REVISED EXHIBIT LIST

<u>Exhibit No.</u>	<u>Description</u>
3	First Amended Complaint
5	November 2, 1005 SAP Business One 2005 Article
8	Otto Reidl notes dated October 14, 2004
9	Oct 14, 2004 IBIS Letter
11	IBIS-SAP Letter
14	SAP Market Strategy Article

18	Otto Reidl notes dated April 17, 2007
19	Otto Reidl notes dated May 11, 2007
21	Email chain beginning with Sotnick email dated November 16, 2007
22	Notes of January 11, 2008 conference call
24	Hodell Consolidated Financial Information
25	“SAP B1 Effect on Productivity”
27	LSi Answer to First Amended Complaint
28	LSi Defendants’ Answers to SAP Discovery Requests
29	IBIS Responses to Requests for Admission
30	SAP Business One software marketing and distribution agreement
31	LSi SAP PartnerEdge Channel Agreement
32	SAP Business One Software Development License Kit
34	SAP Business One Press Fact Sheet October 2003
35	SAP Business One Partner Brief June 2004
36	SAP Business One Solution Brief
37	SAP Business One informational bulletin
38	SAP ROI Calculator
40	Lowery 11/2/03 Email
41	May 17, 2005 Letter
42	Email string beginning with P. Killingsworth 9-13-07
44	Email string beginning with O. Reidl 12-28-04

45	Hodell purchase order from IBIS 12-20-04
46	Invoice from IBIS 12-20-04
49	Email string beginning with Lowery 7-21-05
50	Email string beginning with Van Leeuwen 2-9-06
51	Email string beginning with T. Steffner 6-1-06
52	Email from Lowery 10-25-06
53	Email from Lowery 6-8-2006
54	Email string beginning with J. Woodrum 12-11-06
55	Woodrum 1/12/07 Email
59	Email string beginning with K. Reidl 3-8-07
60	Reidl 3/13/07 Email
61	Email string with attachment 9-19-07
64	Email string beginning with J. Woodrum 3-15-07
65	Email string with attachment beginning with K. Reidl 3-20-07
66	Lowery 3/20/07 Email
67	Lowery 4/7/07 Email
68	Email string beginning with J. Woodrum 4-12-07
69	Ziv 4/12/07 Email
70	Elliot 4/13/07 Email
71	Van Leeuwen 7/30/04 Email
72	LSI customer spreadsheet

73	3/15/04 LSi Press Release
74	2005 B1 Lead Qualification Call Guide
75	Table of B1 Sales
76	Email string beginning with J. Woodrum 4-16-07
77	Ziv 4/15/07 Email
78	Email string beginning with Lowery 4-12-07
79	Lowery 4/16/07 Email
80	Email string beginning with Guagenti 3-13-06
81	Lowery 4/17/07 Email
82	Email string beginning with O. Reidl 4-25-07
83	Kraus 4/25/07 Email
84	Email string beginning with K. Reidl 4-25-07
85	Email from Lowery 4-25-07
86	Email from Lowery 4-26-07
87	Lowery 5/14/07 Email
88	Email string beginning with Lowery 5-22-07
89	Killingsworth 6/6/07 Email
91	Email string beginning with Kraus 7-2-07
92	Woodrum 7/14/07 Email
95	Email string beginning with D. Lacko 8-8-07
98	Email string beginning with Lowery 9-5-07

99	Email string beginning with Lowery 9-7-07
101	Lowery 9/14/07 Email
102	Lowery 9/16/07 Email
103	Lowery 9/17/07 Email
105	Email string beginning with M. Sotnick 9-20-07
106	Email string beginning with Lowery 9-21-07
108	Lowery 11/8/07 Email
109	Sotnick 11/16/07 Email
110	Email with attachment from Lowery 9-16-07
113	Lowery 12/28/07 Email
118	Kraus 1/31/06 Email
119	7/17/06 Sizing Transaction Volumes
122	SAP Business One sizing guide
123	1/30/06 Notes
124	SAP B1 Statement of Direction Release 2005
125	Sizing Dell PowerEdge servers for SAP Business One
126	SAP Business One – standard configurations version 6.5
127	Notes Sept. 13-14, 2004
128	Letter to Dan Lowery 8-1-05
129	Statement of Direction SAP Business One
130	SAP Business Co-Innovation

131	SAP Business One Quick reference Guide
132	Memo regarding Hodell's Business One implementation
134	SAP Business Partner Coop Marketing Guide
138	SAP Business One Order Entry Form
141	Barnea 1/25/06 Email
143	Myrick 3/14/06 Email
147	Lowery 3/15/07 Email
151	E-Mail, 4/17/2007 from Ashley to Boessmann, others
155	12/20/05 IBIS Invoice
156	Email string beginning with J. Woodrum 4-16-07
157	Kraus 4/16/07 Email
158	Mehnert-Meland 4/17/07 Email
159	Ashley 4/17/07 Email
160	Weiss 4/18/07 Email
161	Kraus 6/13/07 Email
162	Neveux 6/18/07 Email
163	Kraus 9/26/07 Email
164	Email string beginning with S. Fuerst 10-10-07
166	Email from E. Neveux 10-17-07
168	Email string beginning with E. Neveux 10-17-07
169	Email string beginning with P. Killingsworth 10-11-07

171	B1 product direction 2005 and roadmap February 2005
172	Email from G. Ashley with attachment 1-19-09
173	Ashley 12/29/11 Email
174	Ashley 1/3/12 Email
176	Email string beginning with G. Ashley 12-22-05
177	Ashley 1/2/06 Memo
178	Ashley 2/10/06 Email
180	Ashley 4/16/07 Email
183	Email from Rodion Pronin 3-13-07
184	Email string beginning with Rodion Pronin 3-13-07
185	Email string beginning with Lowery 3-13-07
187	Email string beginning with Eric Johnson 3-16-07
188	Email string beginning with Lowery (forward of msg. sent 4-11-07 to Udi) 4-12-07
189	Email string beginning with Lorenzo Zecca 4-16-07
190	Elliot email to Krantz and others, 4/25/07
191	Email from Anatoliy Boyko to Rodion Pronin and Ross Elliot dated 4-26-07
192	Elliot email to Krenke and others, 5/22/07
193	Email string between Dan Lowery and Ross Elliott 5-27-07
203	Email string beginning with Elliott 3-16-07
206	Email string beginning with Woodrum 4-3-07

215	Woodrum 5/24/05 Email
217	Bilas 3/14/06 Notes
218	E-mail, 12/9/07, to Jon Woodrum from Dan Lowery
219	E-mail, 12/28/07, to Killingsworth
221	E-mail, 2/22/08, from Jon Woodrum to Dan Lowery
226	E-mail chain, 11/26/06, from Jon Woodrum to Kevin Reidl
227	Woodrum 12/22/06 Email
228	E-mail, 1/17/07, from Jon Woodrum to Kevin Reidl and others
229	E-mail, 3/27/07, from Jon Woodrum to Paul Killingsworth and others
240	SAP Business One 'Sweet Spot' overview for partners
241	Email from Gilad Gruber 4-18-05
242	Power Point titled 'Update on B1 Business Cases'
243	Power Point titled 'SAP Business One 2006 Plan' 12-13-05
244	SAP performance requirements definition document
246	Email from G. Ashley 4-16-07
247	Ziv 4/25/07 Email
248	Power Point titled 'Quality Gate, planning to development' 1-12-06
250	Power Point titled 'Moving B1 Forward' 3-17-06
251	Email from Gadi Shamia 3-13-06
252	SAP maintenance schedule and software license agreement
253	Kraus 3/13/07 Email

255	Email string with top from M. Sotnick 4-16-07
258	Email string beginning with Killingsworth with attached license spreadsheet 9-13-07
259	Sotnick 9/24/07 Email
261	Email string with top to M. Sotnick 10-1-07
262	Sotnick 10/31/07 Email
263	Email string with top from S. Fuerst 11-2-07
264	Email string with top from R. Woodson 12-4-07
265	Email string with top from M. Sotnick 1-10-08
266	Email string with top to P. Killingsworth 5-20-08
267	Kraus 10/1/07 Email
281	Activant Business analysis for Hodell
284	Email from Paul Killingsworth 10-25-07
290	Dale VanLeeuwen subpoena for deposition
291	Development Agreement
292	Lowery 2/7/06 Email
293	Email string beginning with Lowery 2-27-06
294	Lowery 3/3/06 Email
295	Email from Lowery 12/22/05 with attachment
296	Email attachment from Dal Van Leeuwen – SAP Business One – In Flight Enterprise Development Map
297	Reidl 5/19/05 Email

299	Reidl January 2, 2007 email re Stress Tests
300	Reidl January 5, 2007 email re SAP Business Process Testing
301	Winn January 5, 2007 email re Stress Testing
306	Guagenti 3/13/06 Email
314	SAP Business One Brief
400	SAP Partner Edge Opportunity Qualification Tool
401	"Building Winning Solution with ISV Solutions"
402	Boessmann 4/24/07 Email
421	2004 SAP Annual Report
422	2005 SAP Annual Report
423	2006 SAP Annual Report
424	2007 SAP Annual Report
425	SAP Partner Branding Guide
426	Killingsworth 10/22/07 Email
427	Killingsworth to Sotnick email chain dated Oct. 29, 2007
428	"Run With SAP Business One"
431	Killingsworth 4/26/07 Email
432	Shamia 9/29/05 Email
434	SAP Business One Bullet Points
435	SAP Business One-Opportunity Qualification Tool
436	Opportunity Qualification Tool Advanced Topics

437	Killingsworth email to K. Reidl dated May 14, 2007
438	Kraus 5/21/07 Email
439	Boessmann 5/22/07 Email
440	Email string beginning with Jon Woodrum's forward starting on 5-22-07
441	Woodrum 6/8/07 Email
442	Barnea/Weis email dated July 8, 2007
443	Email string beginning with Lowery starting on 9-4-07
444	Lacko 9/28/07 Email
445	Email string beginning with Killingsworth 10-9-07
446	Fuerst 9/27/07 Email
447	Email string beginning with Gillespie 12-10-07
448	US Customer Visits and Partner Event August, 2005
449	SAP messages service – test description
450	SAP Business One SDK Performance Results
451	SAP performance report 2005-SPI Vs 2005
452	SAP Testing Observations
453	SAP Business One Sizing Guide
454	Email string between Daniel Kraus and Naama Aharoni starting 6-6-07
456	Killingsworth email to Sotnick 1/10/08
457	Killingsworth 3/25/08 Email

460	Email string beginning with Killingsworth 11-1-07
600	Hodell Financial Statements Years Ended 2010 and 2009 [HODL030667-HODL030681]
601	PCBC Asset Purchase Agreement and Documentation HODL032366, HODL032253, HODL032254-032304
602	Pinnacle Capital Top Ten Deals of the Year HODL040692-HODL040703; HODL040710-HODL040729
603	Hodell Financial Statements for the Years Ended 2006 and 2007 HODL030622-HODL030636
604	Hodell Financial Statements for the Years Ended 2007 and 2008 HODL030637- HODL030651
605	Hodell Financial Statements for the Years Ended 2008 and 2009 HODL030652- HODL030666
606	Compendium of Hodell Expenses Related to SAP Business One Costs <i>See attached Exhibit A: Kennedy Report Schedule 8</i> HODL040000- HODL040401
607	Compendium of all documents provided to and reviewed by Dr. G. William Kennedy
608	SAP Business One 2004C Release notes published May 2005
609	SAP Business One 2007A Release Notes September 2006
610	SAP Business One Statement of Direction January 2009
611	SAP Business One Statement of Direction 2007, November 2006, version 2.0 released March 29, 2006
612	Presentation by Andreas Wolfinger, SAP AG, Vice President Head of Global Product Management June 2012
615	Compendium of SAP Annual Reports (2004 to present)

616	SAP Business One Solution Brief (A to First Amended Complaint)
617	Devereaux 10/1/03 with American Express Edition Attachment (B to First Amended Complaint)
618	SAP Business One Whitepaper (C to First Amended Complaint)
619	12/20/04 Purchase Order and Invoice (s E and F to First Amended Complaint)
620	SAP B1 Procedure Manual dated October 2006.
621	Summary of Hodell P21 Expenditures While on Business One Beg. Bates No. HODL01388
622	Chart of SAP Business One Implementation Costs Beg. Bates No. HODL01400
623	Chart of Hodell Expenditures for P21 System Beg Bates No. HODL01451
624	O. Reidl Phone Call Notes with Dale Van Leeuwen Sept. 6, 2007 HODL00088
625	SAP B1 Five Year Payback HODL040730-HODL040731
628	PCBC Tax Returns 2004-2008 HODL032305-HODL032360
629	PCBC Financial Statement Comparatives HODL032361-HODL032366
630	PCBC Income History HODL032367
631	Hodell-Natco Acquisition Impact on Net Sales and Income HODL032371- HODL032376
632	Hodell IT Cost Spreadsheet HODL032377

633	Hodell Booking and Sales Charts with Supporting Data HODL032401- HODL032451
634	Charts and Spreadsheet of Hodell Sales With and Without Acquisitions with Supporting Data HODL032452-HODL032484
635	All documents relied upon by Dr. G. William Kennedy as identified in his Expert Report
636	All documents relied upon by Helmuth Guembel as identified in his Expert Report
637	Discovery responses (Interrogatories, Requests for Admission and Requests for Production of Documents) provided by Defendants SAP America, Inc. and SAP AG
638	Discovery responses (Interrogatories, Requests for Admission and Requests for Production of Documents) provided by Defendants LSi-Lowery Systems, Inc. and the IBIS Group, Inc.
639	Discovery responses (Interrogatories, Requests for Admission and Requests for Production of Documents) provided by Plaintiff Hodell-Natco Industries, Inc.
640	All documents provided to and relied upon by the SAP Defendants' Expert witnesses
644	To the extent necessary, any and all documents produced by Defendants SAP America, Inc. and SAP AG in discovery
645	To the extent necessary, any and all documents produced by Defendants SAP America, Inc. and SAP AG in discovery
646	To the extent necessary, any and all documents produced by Plaintiff Hodell-Natco Industries, Inc. in discovery
648	Expert Report of Helmuth Guembel and supporting documents and schedules

Date: February 12, 2014

Respectfully submitted,

/s/ P. Wesley Lambert

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